

EXHIBIT I

**K. Wyer Mar. 29, 2024 *Touhy*
Letter**



U.S. Department of Justice
Civil Division, Federal Programs Branch
1100 L St, NW, Room 12014
Washington, D.C. 20005

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March 29, 2024

VIA EMAIL

Michael Francisco
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Re: ***Doe v. Mast, No. 3:22-cv-49-NKM-JCH***

Michael,

In further response to your *Touhy* requests of February 2 and 9, 2024, I am conveying agency decisions regarding two subsets of the documents that you transmitted for Touhy review. Any documents that are not identified below and have not been addressed in my letters of March 21, 2024 are still under review and thus not authorized to produce.

A. SUBSET A REVIEWED:

DoD has completed review of the following WhatsApp or other text messages:
MAST_TOUHY_001577 through MAST_TOUHY_002345
MAST_TOUHY_006057 through MAST_TOUHY_006734

- 1. REDACTIONS REQUIRED:** The following documents in Subset A are authorized to be produced only in redacted form with a Confidential designation under the Protective Order to protect unredacted federal employee names and contact information. I will separately transmit to you the authorized redacted versions of these documents:

MAST_TOUHY_002124 (Confidential)
MAST_TOUHY_002129 (Confidential)
MAST_TOUHY_002257 (Confidential)
MAST_TOUHY_002288 (Confidential)

- 2. NOT AUTHORIZED:** The following documents in Subset A are not authorized to be produced or used in this case and therefore should not be produced in any form:

The 27 documents marked in your February 2 transmission with Bates numbers from MAST_TOUHY_002319 through MAST_TOUHY_002345

3. **CONFIDENTIAL:** The remainder of the documents in Subset A may be produced without redaction but only with the designation of Confidential under the Protective Order in order to protect federal employee names and contact information.

B. SUBSET B REVIEWED

Relevant agencies have completed review of the following documents:

MAST_TOUHY_001116 through MAST_TOUHY_001294
MAST_TOUHY_001329 through MAST_TOUHY_001380
MAST_TOUHY_001570 through MAST_TOUHY_001571
MAST_TOUHY_002942
MAST_TOUHY_003076 through MAST_TOUHY_003135
MAST_TOUHY_004821 through MAST_TOUHY_005072
MAST_TOUHY_006046 through MAST_TOUHY_006051
MAST_TOUHY_006777 through MAST_TOUHY_006851

1. **REDACTIONS REQUIRED:** The following documents in Subset B are authorized to be produced only in redacted form with a Confidential designation under the Protective Order to protect unredacted federal employee work emails and other contact information and non-party federal employee names. I will separately transmit to you the authorized redacted versions of these documents:

MAST_TOUHY_001336 (Confidential)
MAST_TOUHY_001339 (Confidential)

2. **CONFIDENTIAL:** The following documents in Subset B may be produced without redaction but only with the designation of Confidential under the Protective Order in order to protect federal employee (including your client) work emails and other contact information and non-party federal employee names.

MAST_TOUHY_001116 (Confidential)
MAST_TOUHY_001138 (Confidential)
MAST_TOUHY_001329 (Confidential)
MAST_TOUHY_001341 (Confidential)
MAST_TOUHY_001348 (Confidential)
MAST_TOUHY_001367 (Confidential)
MAST_TOUHY_001379 (Confidential)
MAST_TOUHY_001570 (Confidential)

3. **REMAINDER:** The remainder of the documents in Subset B may be produced without redaction. These documents may contain private information regarding the parties that the parties should designate as Confidential.

The agencies are continuing to review the remainder of the documents. I will transmit further updates regarding their decisions as soon as I am able to do so.

Sincerely,
/s/
Kathryn Wyer